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United States Courts
Southern District of Texas
FILED

AUG 28 2024

Nathan Ochsner, Clerk of Court

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**IN RE:
David Corona,
Debtor**

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**CASE NO. 17-33936-H4-13
CHAPTER 13**

**MOTION OF GLADYS SAPP FOR ISSUANCE OF
SHOW-CAUSE ORDER TO TROY MOUTON**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Gladys Sapp ("Movant"), who files this Motion for Issuance of Show-Cause Order to Troy Mouton, showing in support thereof as follows:

1. On October 12, 2018, this Court entered an Amended Agreed Order Resolving Show Cause Orders Issued Regarding Troy Mouton (a/k/a Troy Washington), David Corona and Yadira Gonzales (the "Agreed Order") [Docket No. 93].
2. The Agreed Order specifically restrained Mouton from engaging in certain acts and practices, including but not limited to:
 - a. Encouraging, counseling, advising or assisting any person with any action in a case under Title 11 with the purpose of delaying or hindering a mortgage creditor from exercising its rights under state law;
 - b. Engaging in the unauthorized practice of law;
 - c. Violating the provisions of 11 U.S.C. §§526, 527 and 528, regulating Debt Relief Agencies;

- d. Serving as a Debt Relief Agency; and
 - e. Violating the requirements of the Mortgage Assistance Relief Services (MARS) Rule, 12 CFR Part 1015.
3. Movant alleges that Mouton has violated the terms of the Agreed Order. Specifically:
- (1) In May 2024, Mouton engaged in conduct that violated multiple provisions of the Agreed Order in his dealings with H. Nathaniel Sapp and Gladys Sapp ("the Sapps") regarding their property at 506 Compton St, Rosharon TX 77583 (the "Subject Property").
 - (2) Mouton offered to assist the Sapps with their mortgage obligations, effectively acting as a Debt Relief Agency without proper authorization and in violation of 11 U.S.C. §§526, 527 and 528.
 - (3) Mouton encouraged and advised the Sapps to transfer their property to him, which had the effect of delaying or hindering their mortgage creditor from exercising its rights under state law.
 - (4) Mouton engaged in the unauthorized practice of law by rendering legal advice and preparing or assisting in the preparation of documents related to the transfer of the Subject Property.
 - (5) Mouton violated the MARS Rule by misrepresenting the nature and terms of his services, failing to provide required disclosures, and giving false or misleading statements about the likelihood of achieving certain results.

(6) Mouton's actions demonstrate a pattern of conduct that disregards the terms and spirit of the Agreed Order as a whole.

4. Movant alleges that Mouton's actions constitute contempt of this Court's Agreed Order.

WHEREFORE, PREMISES CONSIDERED, Movant respectfully requests that this Court:

1. Issue an Order to Show Cause directing Troy Mouton (a/k/a Troy Washington) to appear before this Court at a time certain and show cause why he should not be held in contempt for violation of this Court's Agreed Order;
2. Upon a finding of contempt, impose appropriate sanctions, including but not limited to:
 - a. Monetary sanctions;
 - b. Disgorgement of any funds received from the Sapps or others in violation of the Agreed Order; and
 - c. Such other and further relief as the Court deems just and proper.

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Respectfully Submitted,

THE LAW OFFICE OF KYLE J. MOORE, PLLC

By: /s/ *Kyle J. Moore*

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Attorney for Movant,

Gladys Sapp

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Issuance of Show-Cause Order has been served on the following parties by email on this 26th of August, 2024:

Troy Mouton
c/o Samuel L. Milledge, Esq.
Email: milledge@milledgelawfirm.com

/s/ *Kyle J. Moore*